

in the District Court of the United States
for the Middle District of Alabama
Northern RECEIVED

DeAngelo Manuel
#266919
plaintiff

2021 JUN 21 A 11:28

DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

Civil Action No. 2:19-cv-105-MHT

v.

Kay Ivey et al
defendants

Motion to corroborate with factual evidence

I ask this honorable court to please consider and weigh all exhibits please

Kay Ivey as Responder Superior

When governor Kay Ivey issued her moratorium she instantly became the Superior officer over the parole board as seen ⁽¹⁾ with her moratorium compelling the board members to act or respond in any manner and ⁽²⁾ with the considerations and granting of parole in a downward spiral since her moratorium with the only aim of keeping us in prison, even people like myself that was already granted parole.

please take note that its public record that GEO and Coercive endorsed her gubernatorial campaign the same Geo and Coercive she was saying ⁽³⁾ to proceed to have them build private prisons that would be leased to Alabama which was strongly opposed by other political leaders and the DOJ

to impose supervisory liability under 42 USC 1983 plaintiff must demonstrate that officials has actual or notice of unconstitutional practice and demonstrates gross negligence or deliberate indifference by failing^{to} act *Meris v. Vivoni*, 244 Supp. 2d 146 governor Kay Ivey had an ample amount of opportunity to tell her parole board ~~to~~ ^{they} ~~can~~ use Jimmy Spencer against us and her moratorium was not to affect any body our side of its 75 day affect

to tie any individual to conspiracy more than a vague conclusory allegation charging that individual with participation in the conspiracy are necessary, under conspiracy theory participation need not extend to act leading to deprivation of rights which at least extend to conspiracy itself conspiracy can cause deprivation of right by a policy or custom and demonstrate causal connection between conspiracy and deprivation of constitutional right *Singer v. Wadman*, 595 F. Supp 188 she's well aware her moratorium had an adverse effect beyond the scope of her 75 day period defendants who engage in private conduct may be found liable if it is established that they have acted in concert with another party against whom valid claim can be stated *Briley v. California*, 564 F.2d 849 through Iyan head the governor had my parole rescinded and through the new members she appointed she's been keeping us in prison by her posited of members that will carry out

her will

this is the biggest conspiracy since the penitentiary system that resubjugated blacks back into slavery using trumped up judicial proceedings after the abolition of slavery until 1945 with Alabama being the leading state in the Neo Slaver penitentiary system

in a meeting comprised of Republicans with Governor Ivey being chief officer of the state and a Republican the statement was made keep them in prison for as long as their sentence will allow as seen in exhibits 1A with a statement like that why does Alabama have a parole board like I told this honorable court people are being denied parole before their even considered in violation of our 14th amendment 10th, 9th and 8th amendments, and Substantive Due process even people like me that was already proved

please keep note I'm suing all in ~~the~~^{their} official and individual capacity and I ask to be awarded every relief warranted in addition to 5,000,000 in damages this court sees the deliberate indifference amid all the violence going on in these overcrowded inhumane prisons and the ~~hopeless~~ hopelessness created by a governor and parole board that's holding us accountable for Jimmy Stenebeck's actions

I ask governor Kay Ivey in my camp/discussion
in regards to jimmy spencer if the board was in
violation why weren't they held responsible under
Title 15 section 15-22-39 and section 15-22-40
of the Code of Alabama that can be circumvented
the reason Title 15 and the section there of was not
enforce because the board didn't do anything
wrong and under the stringent condition of
Title 15 section 15-22-39 and 15-22-40
the board ~~was~~ would have fought her
matutarium tooth and nail in regard to
jimmy spencer release on parole and she knew
the board didn't do anything wrong by releasing
jimmy spencer spencer did 29 years on
life with the possibility of parole but the
board did go along with her political motive
which she called a matutarium with no harm
to anybody but the inmates locked up in alabama

Administrative Procedure act: a court must hold unlawful and set aside agency action finding conclusions found to be arbitrary and capricious and an abuse of discretion or otherwise not in accordance with law 5 U.S.C.S § 706
an agency action is arbitrary and capricious where (1)
the agency relied on factors which Congress or legislation has not intended for it to consider
I'm not Jimmy Spence and my parole was granted before the governor's inauguration

Abuse of process

perversion of lawfully initiated process to illegitimate ends
they thought they would be able to mask their
unlawful conduct and political ruse with tasks of
public protection and inmates not having a liberty interest
with the parole board being so pliable under
the hand of governor Kay Ivey and her
Kronies direction you can see the underlying
conspiracy

I'm being wid only because of jimmy spencer and
a governor thats using her executive position to
enforce her political motive and thats easy to
do against sub class or minority groups such as
inmates

I'm sure this honorable court can see whats going
on by the record and on its face

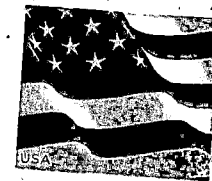
Certificate of Service

I hereby certify that I mailed a copy of
the for going to
Greg Lock Her
Assistant Attorney General
Alabama Bureau of Pardons and Paroles
100 Capitol Commerce Blvd, Suite 310
Montgomery, AL 36117

Date this 18th of June

DeAngelo Manuel
DeAngelo Manuel

DeAngelo Manuel # 266719
Tomball Correctional Facility
Tomball 3800
Atmore AL 36503-3800



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